

Dear Ms. Childs

August 19, 2004

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I am writing concerning the BLM proposition to update the northeastern National Petroleum Reserve Plan. I am an avian ecologist who has assisted on bird impact assessment studies in the northeastern area of the NPR-A, and I have also worked in the Kuparuk Oil Field on the breeding ecology of shorebirds. My experience and background as an ecologist, my concern for Arctic breeding habitat for birds and other species, and my interest and concern as a US citizen prompt this letter.

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It is my understanding that you are considering two alternatives to your current Plan for this area, namely to open further allotments, either 96% or 100% of the NPR-A, for oil leasing, development and extraction. I have reviewed the EIS on the BLM web site, and I have a few comments I would like you to consider.

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Birds

As a specialist on shorebirds (Charadriidae and Scolopacidae), I am deeply concerned about the development of this vast and critically important Arctic breeding ground. This group of birds faces global population declines currently. Up to 36% of all species of shorebirds have statistically significant declining population trends. Habitat modification and loss is now considered the primary cause of detriment to these species. Oil drilling, exploration, and extraction within the NPR-A represents an *untested* and *uncertain* challenge to their use of this area for breeding. While reading the EIS it was surprising to me that there was a lack of consideration of shorebird species in development planning. There also was an absence of anything that addressed the conservation status of these birds or a plan about how oil companies who extract oil will mitigate for loss or compromise of breeding habitat for these and other wildlife species. I am especially disappointed and disheartened in these omissions.

004
Birds

I am concerned that the BLM has not supported a rigorous enough ecological assessment of the impacts of oil development in the NPR-A, northwest or northeast sectors. Because of the conservation status of the shorebirds that breed in the NPR-A, particularly the Golden Plover and Bar-tailed Godwit, I am concerned that their needs are not being addressed adequately in this planning process. I hope that you will not respond by saying that all species cannot be considered, as this group of birds is unique, ecologically important, and has different habitat requirement than the few species of geese and ducks that have been included in the EIS.

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Monitoring

Specifically, and this addresses all wildlife and habitat concerns within the NPR-A as a whole, I was disappointed to see that there are no plans for continued monitoring of wildlife (including shorebirds) both during and after development. Since some oil companies did conduct pre-impact assessments in the northeastern portion of the NPR-A (e.g. the Colville River area), it is only logical and sensible to require that they continue these both during and after development. Without continued monitoring there is absolutely no scientifically-defensible means by which to assess whether the oil development process is harmful to wildlife and various habitats within this area. It would be most prudent of the BLM as a public land management agency to ensure the public that *all resources* on our lands are being managed to the best of our ability. I cannot say

that you have convinced me of this. Continuous monitoring and an adaptive management approach are the best ways to ensure that all populations of wildlife and their habitat are being cared for. Currently, I see no plans within your assessment documents for continuous monitoring, and no pledge to adapt on-going management plans as conditions change during oil development.

I cannot support the BLM request to open any further leases to oil companies, and I hope that you will see the need to be more conservative in the offering up of our Oil Reserves, and natural resources. I believe we should not develop any more of the NPR-A, and I sincerely request that you not open any more of the NPR-A to oil leases.

Thank you,

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